

Aventis CropScience

457822-00



October 15, 2002

Ms. Joanne I. Miller  
Product Manager 23  
Office of Pesticide Programs (H7505C)  
U. S. Environmental Protection Agency  
Crystal Mall 2  
1921 Jefferson Davis Highway  
Arlington VA, 22202

**Subject: Glufosinate Ammonium  
Liberty™ Herbicide  
EPA Registration Number: 264-660  
EPA Pesticide Petitions: 7F04910 and 8F04997  
Submission of Data to Fulfill a Condition Of Registration**

Dear Ms. Miller:

In a memorandum of July 9, 1999 from Tom Bloem (EPA) to Mr. V. Dorr (AgrEvo USA Company), the Agency indicated Storage Stability for Sugar Beet Processed Commodities (3 months) as a deficiency in the Executive Summary of Chemistry Deficiencies. This review stated:

*"Processed samples were stored for 3 months prior to analysis. No storage stability data for sugar beet pulp, molasses or sugar have been submitted. Unconditional registration may be granted upon validation of the three month storage interval for the processed commodities (sugar, pulp and molasses)."*

AgrEvo USA Company (now Aventis CropScience) agreed to comply with these conditions in a letter from Mr. V. Dorr to you dated August 5, 1999 and the required study has been conducted. Enclosed with this cover is the report for the storage stability for the processed commodities sugar, pulp and molasses. This study was conducted according to the EPA guideline requirements for processed food/feed (Health Effects Test Guidelines Series OPPTS 860.1520). As indicated to the Agency in Mr. Dorr's letter of August 5, 1999, the storage stability study was conducted beyond the required period of 3 months. The recovery data show that residues of AE F039866 and its metabolites in sugar beet processed fractions are stable over at least a 9 month period when stored at approximately -20°C.

Submitted with this cover are the following:

- ◆ Certification with Respect to Citation of Data (EPA Form 8570-34)
- ◆ Data Matrix for Internal EPA Use (EPA form 8570-35)
- ◆ A blackened copy of the Data Matrix form for public use.
- ◆ Three copies of the Transmittal Document (Document 1 of 2)
- ◆ Three copies of the study being submitted to (Documents 2]

Please contact me if you have questions regarding the studies submitted or  
require additional information.

Sincerely,



Paul A. Cain, Ph. D  
Registration Manager

Phone: (919) 549-2582

Fax: (919) 549-2545

e-mail: paul.cain@aventis.com

*Aventis CropScience*



**TRANSMITTAL DOCUMENT**

Document 1 of 2

**Data Submitted to Fulfill a Condition of Liberty® Herbicide  
Registration**

**IN SUPPORT OF**

Liberty® Herbicide, EPA Reg. No. 264-660

**TRANSMITTAL DATE**

October 15, 2002

**Company Official:**

(signature)

**Company Name:**

Aventis CropScience USA LP

**Company Contact:**

Paul A. Cain

**Telephone:**

(919) 549-2582

Aventis CropScience  
P.O. Box 12014, 2 T.W. Alexander Drive  
Research Triangle Park, NC 27709

## BIBLIOGRAPHY OF SUBMITTED STUDIES

**Product (EPA Registration Number):** Liberty® Herbicide (264-660)  
**Purpose of Submission:** Data to Fulfill Registration  
**Date of Submission:** October 14, 2002

| Doc Number | Study Description  | Study ID | Study Status | Study Number |
|------------|--|----------|--------------|--------------|
| 1 of 2     | Transmittal Document   | NA       | NA           | NA           |
| 2 of 2     | Wyatt, D. (2002). Frozen Storage Stability of AE F039866 (Glufosinate-Ammonium) and its Metabolites, AE F099730 and AE F061517 in Tolerant Sugar Beet Processed Fractions (Pulp, Molasses, Refined Sugar); Xenos Laboratories, Ottawa, Ontario Canada; August 12, 2002; 112 pages. | B003971  | NA           | 45782201     |

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